

**IN THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION**

CHRIS C. WOOD, D/B/A CCW ELECTRIC

PLAINTIFF

V.

CAUSE NO. 3:22-cv-00607-HTW-LGI

STUART IRBY CO., INC.

DEFENDANT

**MOTION TO WITHDRAW AS COUNSEL FOR
PLAINTIFF/COUNTER-DEFENDANT CHRIS C. WOOD
BY H. HUNTER TWIFORD IV**

COMES NOW, H. Hunter Twiford IV, undersigned counsel for the Plaintiff Chris C. Wood (“Wood”), and files this Motion to Withdraw as Counsel for Plaintiff/Counter-Defendant Chris C. Wood per Local Uniform Rule 83.1(b)(3) and would show the following, to-wit:

1. Currently, this matter is pending the Court’s rulings on more than twenty (20) motions, including several procedural motions and a substantial number of substantive motions *in limine* and for summary judgment and partial summary judgment.
2. This matter is not currently set for a trial to begin on any specific date, the Court having advised on April 26th that it would reset the matter for trial after ruling on dispositive motions should there remain issues for trial.
3. An irreconcilable conflict has arisen between Plaintiff Wood and undersigned counsel which necessitates counsel’s withdrawal as counsel of record for Wood.
4. As required per Local Uniform Rule 7(b)(10) prior to filing the instant Motion, Undersigned counsel transmitted the proposed Motion to counsel for Defendant Stuart C. Irby Company (see Exhibit “A” attached hereto which is a true and correct copy of the July 24, 2024 transmission email from H. Hunter Twiford IV to counsel for Defendant), and Defendant’s

counsel informed undersigned counsel that Defendant does not oppose the Motion. (See Exhibit “B” attached hereto which is a true and correct copy of the July 24, 2024 email reply from counsel for Defendant)

5. Should this Motion to Withdraw be granted, undersigned counsel respectfully requests that Plaintiff/Counter-Defendant Wood be granted thirty (30) days to secure new counsel from the date of entry of the Court’s Order granting this Motion.

6. As required per Local Uniform Rule 83.1(b)(3), undersigned counsel transmitted (via U.S. Mail and email dated July 24, 2024) several documents to Wood, including: earlier draft versions of this Motion to Withdraw (the two (2) drafts were drafted and transmitted to Wood prior to receiving Irby’s representation that the Motion was unopposed and contained a signature line for Wood to execute); an instructional letter requesting that Wood sign and return the Motion to Withdraw by July 29, 2024; and, providing the relevant Local Uniform Rules to Wood. Wood has not responded to counsel’s email/letter.

7. Per Local Uniform Rules 83.1(b)(3), counsel submits contemporaneously herewith by separate transmission to the Court’s chambers a proposed order granting this Motion to Withdraw.

8. The Court noticed a status conference between the parties to occur on August 14, 2024 at 10:00 a.m. in Judge Wingate’s Courtroom 6A, and undersigned counsel shall set and intends to bring on this Motion to Withdraw for hearing at that same date and time.

WHEREFORE, PREMISES CONSIDERED H. Hunter Twiford IV, undersigned counsel for Plaintiff/Counter-Defendant Chris C. Wood, respectfully requests that the Court grant counsel’s instant Motion to Withdraw and enter an order allowing said withdrawal and

allotting Wood thirty (30) additional days from the date of entry to secure new legal counsel to represent him in this matter.

This the 29th day of July, 2024.

RESPECTFULLY SUBMITTED,

/S/H. HUNTER TWIFORD IV
H. HUNTER TWIFORD IV
Counsel for Plaintiff

Prepared by:

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Counsel for Plaintiff Chris C. Wood d/b/a CCW Electric

CERTIFICATE OF SERVICE

I hereby certify that I have filed the foregoing Motion to Withdraw as Counsel for Plaintiff/Counter-Defendant Chris C. Wood by H. Hunter Twiford IV with the Court's ECF system, which caused the foregoing to be sent via email to the following:

Haley F. Gregory	haley.gregory@butlersnow.com
Brian Kimball	brian.kimball@butlersnow.com
Brianna Caldwell	brianna.caldwell@butlersnow.com

Attorneys for Defendant

Further, I hereby certify that I am transmitting this day a filed copy of this Motion to Withdraw as Counsel for Plaintiff/Counter-Defendant Chris C. Wood by H. Hunter Twiford IV to Plaintiff **Chris C. Wood** via email and U.S. Mail at the following address:

Chris C. Wood d/b/a CCW Electric
8429 SW 39th Street
Oklahoma City, OK 73179
ccwelectric@yahoo.com

Plaintiff/Counter-Defendant

This the 29th day of July, 2024.

/s/H. Hunter Twiford IV
H. Hunter Twiford IV, Esq.